

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas

FILED

June 01, 2020

David J. Bradley, Clerk of Court

United States of America

v.

Jorge Rangel CHARLES

Case No. **4:20mj0980**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 26, 2020 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:Code Section
18 U.S.C. § 641Offense Description
Theft of United States property

This criminal complaint is based on these facts:

SEE ATTACHED

☒ Continued on the attached sheet.

Complainant's signature

SA Dominic Rosamilia

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/01/2020City and state: Houston, Texas

Judge's signature

United States Magistrate Judge Peter Bray

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN THE MATTER OF THE ARREST OF: JORGE RANGEL CHARLES	§ § § §	MAGISTRATE NO.
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AFFIDAVIT IN SUPPORT OF APPLICATION

I, Dominic Rosamilia, Affiant, having been duly sworn, do hereby state the following:

A. Introduction and Agent Background:

1. I am an investigative or law enforcement officer within the meaning of Section 2510(7) of Title 18, United States Code, that is an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.
2. I am a Special Agent (SA) of the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, and have been so employed since April of 2009. I graduated from the Federal Law Enforcement Training Center and the ATF National Academy in Glynco, Georgia. I am presently a member of Houston Group II of the ATF. As a Special Agent of the ATF, my duties and responsibilities include conducting criminal

investigations of individuals and entities for possible violations of federal laws, particularly those laws found in Title 18 of the United States Code. I have received additional law enforcement training at Chesterfield County Police Department. I was employed by Chesterfield County Police for thirteen years. While at Chesterfield County Police Department I was assigned to investigations, vice and narcotics, community policing, patrol and was a Sergeant. I have instructed several topics throughout the state of Virginia to include Search and Seizure and Basic Law. I have requested and executed over 100 search warrants. I am a graduate of The State University of New York at Buffalo with a bachelor degree in Health and Human Services.

3. My current assignment with Houston Group II, involves the investigation of individuals who traffic firearms, violent criminals, criminal organizations such as street gangs and drug trafficking organizations. I have used cooperating informants, undercover agents, pen register/trap and trace devices, video surveillance, wiretaps, GPS tracking devices, and audio surveillance, among other law enforcement techniques, in the course of my career with ATF.

4. Wherefore, as a sworn officer your Affiant is authorized to investigate violations of laws of the United States, and is a law enforcement officer with the authority to execute warrants issued under the authority of the United

States, this affidavit is made in support of an application for the arrest of Jorge Rangel CHARLES for violation of 18 U.S.C. § 641 theft of United States property.

5. The purpose of this application is to establish probable cause for the arrest Jorge Rangel CHARLES for violation of 18 U.S.C. § 641 theft of United States property. As set forth herein, your Affiant states there is probable cause to believe that Jorge Rangel CHARLES, and others known and unknown, committed theft in violation of 18 U.S.C. § 641.

B. Facts Supporting Probable Cause:

1. The statements in this affidavit are based upon my investigation, investigation by Houston Police Officers, the Naval Criminal Investigative Service (NCIS), public source and business records, and my experience and background as a Special Agent of the ATF. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Jorge Rangel CHARLES committed acts in violation of Title 18, United States Code, Section 641.

2. Your Affiant, on May 31, 2020, was assigned to conduct an investigation into NCIS case 27May20-CNCC-0037-6RNA and HPD report

703979-20. Affiant learned that on MAY 26, 2020, at approximately 3:30pm, NCIS Special Agent (SA) Jeremy Hauck, parked his 2019 Chevy Tahoe on the 4th floor, in the parking garage located 1905 Rusk, Houston, TX. The Tahoe contained a Truck Vault in the rear compartment area. Within the locked Truck Vault was a Colt, MK-18, fully automatic rifle bearing serial number 1339863, a Colt, M-4, fully automatic rifle bearing serial number W382577, a Knights armament suppressor bearing serial number T111773, night vision optics for a sniper rifle and a ballistic vest marked "Special Agent NCIS" on the back and "Police" on the front. In a box located on the rear passenger seat was another ballistic vest similarly marked.

3. On MAY 27 20, at approximately 1030am, SA Hauck returned to the parking garage and discovered his vehicle was missing. Hauck confirmed the vehicle was not towed and contacted HPD.

4. Later that day, SA Hauck was notified his vehicle was recovered at 5353 Pease Street, Houston TX. When the vehicle was recovered none of the aforementioned items were recovered from the vehicle.

5. HPD reviewed the video recording of May 26, 2020 from the parking garage at 1905 Rusk. At approximately 1130pm, a Chevrolet Cruz entered the garage from the wrong direction. Two individuals, a male and female, exit, later identified as Jorge Rangel CHARLES and Andrea Marie

VASQUEZ, exited the Cruz. HPD Officers Tierney and Rodriguez viewed the surveillance video from the parking garage and both officers immediately recognized CHARLES and VASQUEZ. HPD Officers Tierney and Rodriguez have dealt with both suspects in HPD incident 1459352-19. HPD Officers were also familiar with CHARLES and VASQUEZ using a Chevy Cruz bearing license plate LWD5812 in multiple auto thefts. In the surveillance video, CHARLES and VASQUEZ were seen walking around the parking lot. CHARLES and VASQUEZ were seen walking by the Tahoe at approximately 11:32pm. VASQUEZ and CHARLES walked away from the Tahoe. At 11:35pm, CHARLES is then seen running toward the Tahoe. He is seen breaking into the Tahoe then running items to the Chevy Cruz to include a ballistic vest. CHARLES returns to the Tahoe and drives through the lowered gate with the Cruz behind it at 11:46pm. A partial plate of the Cruz was seen on the video. HPD Task Force determined the Chevrolet Cruz, bearing Texas license plate LWD5812 belonged to VASQUEZ.

5. On MAY 28, 2020, HPD obtained an arrest warrant for CHARLES and VASQUEZ. At approximately 8pm on May 28, 2020, VASQUEZ and CHARLES were arrested on state charges for auto theft. Following their arrests, CHARLES was shown a still image of VASQUEZ in the parking garage on May 26, 2020, just prior to the theft of the aforementioned Tahoe.

CHARLES identified the still image to be VASQUEZ. VASQUEZ was shown a still image of CHARLES and VASQUEZ in the parking garage moments before the Tahoe was stolen. VASQUEZ stated identified herself and CHARLES in the surveillance image. VASQUEZ stated she was at Club Azuza and got extremely intoxicated. She stated she did not remember anything. She only remembered going into the garage and standing by an elevator. She denied knowing CHARLES stole the Tahoe. CHARLES requested a lawyer.

6. On June 1, 2020, ATF SA Rosamilia and NCIS SA McMains responded to 1010 South Wayside Drive, Houston TX and surveilled Apartment 402, the address that HPD viewed CHARLES and VASQUEZ moving into on May 28, 2020. VASQUEZ is the tenant listed on the lease. CHARLES and VASQUEZ were observed entering and leaving the apartment. When CHARLES and VASQUEZ exited the apartment, SA Rosamilia and SA McMains approached CHARLES in an effort to locate the two automatic firearms. CHARLES refused to cooperate. After conferring with the United States Attorney's Office of the Southern District of Texas, CHARLES was arrested for theft of United States property.

C. Conclusion:

Based upon the forgoing information, Affiant believes probable cause exists that Jorge Rangel CHARLES committed offenses in violation of 18 U.S.C. § 641, theft of United States property. Affiant requests authorization to arrest Jorge Rangel CHARLES.


ATF S/A Dominic P. Rosamilia

Sworn telephonically before me on this the 1st day of June, 2020, I find probable cause.


PETER BRAY
UNITED STATES MAGISTRATE JUDGE